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July 26, 2019

VIA ECF AND E-MAIL

Honorable Loretta A. Preska
United States District Court
Southern District of New York
500 Pearl Street, Room 2220
New York, New York 10007

RE: Kaye v. NYC Health & Hospitals Corp. et. al.
Index No.: 18-cv-12137(JPO)
Referral to Mediation Program

Dear Honorable Judge Preska:

I am writing to respectfully request the designation of a mediator and for the following discovery to facilitate settlement discussions. In terms of discovery, Plaintiff respectfully requests the initial production of the following categories of documents:

- 1) any salary and all personnel actions for Plaintiff's comparators at the Court Clinics from 2013 to present (i.e. either the Medical Directors or Directors at the Borough Court Clinics);
- 2) any and all correspondence involving Plaintiff from H + H Office of Corporate Compliance, including any and all investigations pertaining to Plaintiff;
- 3) any and all correspondence involving Plaintiff and H + H's EEO Office; and
- 4) the initial production of ESI containing Plaintiff's name in the subject and or body of emails from the following custodians from the period of 2013 to present: Patricia (Patsy) Yang; Ross MacDonald; Elizabeth Ford; Abhishek Jain; and Jonathan Wangel).

In closing, Plaintiff is looking forward to participating in the Mediation Program in good faith. Accordingly, I am writing the Court to insure that the discussions are informed and are transparent.

Respectfully submitted,

/s/

—THE LAW OFFICES OF—

Special | Hagan

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